State of California
Department of Housing and Community Development

RECIRCULATED
DRAFT
ENVIRONMENTAL IMPACT REPORT

Adoption of Regulations Permitting Statewide Residential Use of Chlorinated Polyvinyl Chloride (CPVC) Plastic Plumbing Pipe without First Making a Finding of Potential Premature Metallic Pipe Failure Due to Local Water or Soil Conditions

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Chapter 2.0

EXECUTIVE SUMMARY

2.1 Introduction

This chapter provides a summary of the proposed Project, environmental impacts that would result from project implementation, a summary of project alternatives, and the potential areas of controversy. This chapter also includes a table summarizing the impacts of the proposed Project and mitigation measures that have been identified to reduce potentially significant impacts to less than significant levels.

2.2 Project Location

If the proposed regulations are adopted, increased use of CPVC pipe is anticipated in residential buildings throughout the State of California. The net effect of adoption of the proposed regulations is estimated to be an increase in the use of CPVC for potable water conveyance, with a proportionate decrease in the use of other materials.

2.3 Project Description

The project is the adoption of regulations (i.e., building standards) pertaining to the use of CPVC pipe for potable water piping in buildings under the jurisdiction of the Lead Agency which include: hotels, motels, lodging houses, apartment houses, dwellings, dormitories, condominiums, shelters for homeless persons, congregate residences, employee housing, factory-built housing and other types of dwellings containing sleeping accommodations with or without common toilet or cooking facilities including accessory buildings, facilities, and uses thereto; as well as permanent buildings, and permanent accessory buildings or structures, constructed within mobile home parks and special occupancy parks that are under the control and ownership of the park operator.

In this EIR, the terms "CPVC" and "CPVC pipe" refer to chlorinated polyvinyl chloride pipe, fittings, and the materials used to join CPVC pipe and fittings, unless the context clearly indicates otherwise. These regulations, if approved, would become part of the California Plumbing Code, which is a segment of the California Building Standards Code. The California Building Standards Commission is responsible for final adoption of the California Building Standards Code. The California Building Standards Commission receives proposed codes from a number of public agencies which have statutory authority to propose codes for various types of occupancies. The code provisions related to potable water piping in residential buildings are the responsibility of the Lead Agency.

The modifications to the existing plumbing code would entail removing the current requirement that a building official make a finding that there is or will be the premature failure of metallic pipes due to existing water or soil conditions (referred to as the "Findings Requirement") prior to allowing CPVC to be used for potable water piping. The express terms of the proposed code change appear in Chapter 3 of this RDEIR.

2.4 Issues to be Resolved and Areas of Controversy

In accordance with Section 15082 of the CEQA Guidelines, the Lead Agency circulated a Notice of Preparation (**NOP**) for the DEIR on January 11, 2006, for a 30-day review period. These notices were circulated to the public, local and state agencies, and other interested parties to inform responsible agencies and the public that the Project could have significant effects on the environment and to solicit their comments. The NOP and comments received in response to the NOP are presented in Appendix C.

This current EIR is a Subsequent EIR to the 2000 Mitigated Negative Declaration prepared pursuant to CEQA Guidelines Section 15162. Thus, this EIR evaluates the proposed change to the existing California Plumbing Code regulation regarding the use of CPVC for residential plumbing systems and the impact of that change. As such, this EIR will not repeat the review of impacts that remain the same as those addressed in the 2000 MND. It does not evaluate whether or not CPVC should be allowed in California in the first instance in residential structures, because such use of CPVC is already allowed throughout the state, provided that the required finding is made. This EIR does evaluate the potential increase in the use of CPVC if the Findings Requirement is deleted. With respect to all other impacts and all other information, the analysis of the 2000 MND continues to apply and is incorporated into this EIR. The following environmental resources were found to have the potential of being significantly affected by the proposed Project and have been addressed in greater detail in this EIR.

1. Air Quality
2. Water Quality
3. Worker Safety
4. Solid Waste

Issues that were previously addressed in the 2000 MND and which remain the same, and which therefore were not further evaluated in this EIR include:

1. Land Use Consistency
2. Transportation / Circulation
3. Population / Housing
4. Geology / Soils

5. Agricultural Resources
6. Noise
7. Biological Resources
8. Drainage and Hydrology
9. Hazards and Hazardous Materials
10. Cultural Resources
11. Aesthetics
12. Recreation
13. Mineral Resources

Potential areas of controversy surrounding the Project identified as part of the NOP process that are evaluated in Chapter 4.0 of the Recirculated Draft EIR are shown below:

Environmental Topic	Areas of Controversy
Air Quality	Claims regarding air quality impacts as a result of Reactive Organic Gas (ROG) emissions from CPVC adhesives.
Water Quality	Claims regarding contamination of drinking water and receiving water bodies due to leaching of organotins, precursors to disinfection byproducts, or other materials found in CPVC residential potable water systems.
Worker Safety	Claims regarding inhalation exposure to vapors from CPVC adhesives during installation, dermal exposure to CPVC adhesives, carcinogenic effects from adhesives, and enforcement of existing ventilation and glove worker safety mitigation measures in the California Plumbing Code.
Solid Waste	Claims regarding landfill capacity to serve solid waste disposal needs related to the Project.

2.5 ALTERNATIVES TO THE PROPOSED PROJECT

2.5.1 ALTERNATIVES TO THE PROPOSED PROJECT (PP)

CEQA Guidelines Sections 15126 and 15126.6 require an EIR to consider a reasonable range of alternatives that could feasibly attain the basic objectives of the proposed project. This Recirculated Draft EIR analyzes three alternatives in addition to the proposed Project: 1) No project; 2) Delete the Findings Requirement and require the use of Low-VOC cements and primers for joining CPVC pipe; and 3) Delete the Findings Requirement and require the use of Low-VOC, one-step cements. Low-VOC cements and primers are CPVC adhesives that do not require the use of primers and have a

limited amount of volatile organic compounds (VOCs). One-step cements are CPVC cements that do not require the use of primers

2.6 SUMMARY OF ENVIRONMENTAL IMPACTS

Table 2-1 presents a summary of project impacts, and proposed mitigation measures to reduce potentially significant impacts. The table is arranged in four columns: 1) significant impacts; 2) level of significance without mitigation; 3) mitigation measures; and 4) level of significance after mitigation.

Levels of significant are categorizes as follows: SU = Significant and Unavoidable; S = Significant; LTS = Less Than Significant. For detailed discussions of all project impacts and mitigation measures, please refer to the environmental analysis sections in Chapter 4.0.

Table 2-1 – Summary of Impacts and Mitigation Measures

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Air Quality			
Impact 4.2–1: The Project Could Increase ROG Emissions in Several Air Districts to a Level that Exceeds the ROG Significance Thresholds Established by Those Districts. Each California air district has established ROG significance thresholds. Those thresholds are based on either tons per year or pounds per day limits (see Table C-1). Those thresholds, along with the Project's contribution to ROG emissions in each air district, are compared in Tables 4.2.4.14 and 4.2.4.15. Those	S	**Mitigation Measure 4.2-1:** Require the Use of One-Step Cement (Without Primer)	SU

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
tables show that the Project would generate ROG emissions exceeding the most restrictive significance thresholds in the following air districts: • Bay Area Air Quality Management District; • Feather River Air Quality Management District; • Mojave Desert Air District; • Sacramento Metropolitan Air Quality Management District; • San Luis Obispo County Air Pollution Control District, • San Joaquin Valley Air Pollution Control District; and • South Coast Air Quality Management District.			
Water Quality			
Impact 4.3-1: Leachates. There is the potential that materials within CPVC or materials used in CPVC installation could contaminate the water carried through the pipe.	LTS	None required.	
Impact 4.3-2: Disinfection	LTS	None required.	

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Byproducts (DBPs) Freshly installed CPVC plumbing systems can leach organics into drinking water that may serve as DBP precursors.			
Worker Safety			
Impact 4.4-1: Inhalation Exposure to Vapors from CPVC Installation.	LTS	None required.	
Impact 4.4-2: Dermal Exposure to Adhesives	LTS	None required	
Impact 4.4-3: Carcinogenic Effects from Adhesives	LTS	None required	
Impact 4.4-4: Enforcement of California Plumbing Code Regulations and Mitigation Measures	LTS	None required	
Solid Waste			
Impact 4.5-1: Landfill Capacity. The Project may result in disposal of CPVC pipe in landfills to a minor degree during CPVC pipe installation (due to the discarding of scraps). A somewhat greater degree of disposal may occur when the CPVC pipe is replaced, although during most replacement jobs the existing pipe is left in place and not disposed in landfills. Most disposal of CPVC pipe in	LTS	None required.	

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
landfills would occur when residential structures plumbed with CPVC are demolished.			
Impact 4.5-2: Compliance with Statutes and Regulations.	LTS	None required.	
Cumulative Impacts			
Cumulative Air Quality Impacts: The Project will indirectly generate ozone precursors that could lead to ozone formation. Several areas within California are classified as non-attainment for state and federal ozone regulations. Even a small addition of ozone to these areas by the Project would be considered to be an incremental effect that would contribute to the problem in a manner that is cumulatively considerable.	S	**Mitigation Measure 4.2-1**: Require the Use of One-Step Cement (Without Primer)	SU
Cumulative Water Quality Impacts: The Project potentially could have a cumulative water quality impact if the increased use of the existing flushing mitigation measure in Section 301.0.1, Appendix I, Installation Standards, California Plumbing Code, which was adopted as part of project analyzed in the 2000 MND, that would occur as a result of the increase in CPVC usage for residential	LTS	None required.	

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance with Mitigation
potable water systems, would add pollutants to already stressed sensitive waster bodies.			